

DN X05 CV-00-0180933S	:	SUPERIOR COURT
DN X08 CV-00-0180933S	:	
	:	
STNALEY SHENKER & ASSOCIATES, INC.	:	COMPLEX LITIGATION
Plaintiff,	:	DOCKET
v.	:	AT STAMFORD
	:	
WORLD WRESTLING FEDERATION	:	FEBRAURY 18, 2003
ENTERTAINMENT, INC.	:	

**PLAINTIFF'S AMENDED RESPONSES
TO DEFENDANT'S THIRD SET OF INTERROGATORIES
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Stanley Shenker & Associates, Inc. ("SSAI"), pursuant to Practice Book Section 13-15, hereby amends its prior responses dated May 29, 2002 to Defendant, World Wrestling Federation Entertainment, Inc.'s ("WWFE" or "WWE") Third Set of Interrogatories and Second Request for Production of Documents dated November 26, 2001 as follows:

INTERROGATORIES

1. Has SSAI or Shenker, or anyone action on behalf of SSAI or Shenker, ever solicited, requested and/or demanded any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee?

RESPONSE: No, but see response to Interrogatory number 6.

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2. If your answer to Interrogatory No. 1 is yes, please provide the following information.

RESPONSE: No, but see answer to Interrogatory no. 6.

3. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever solicited, requested and/or demanded any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee?

RESPONSE: No.

4. If you answer to Interrogatory No. 3 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: N/A.

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5. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever received any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee?

RESPONSE: Yes.

6. If your answer to Interrogatory No. 5 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand,
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: In the spring of 1998, Mr. Jim Bell and Mr. Robert Goetz (of Trinity Products, an existing licensee) and Eve Covell, a Sales Manager at Trinity, held a meeting at Mr. Bell's office at WWE. Mr. Shenker was not in that meeting. Ms. Kovell left the meeting and Mr. Bell and Mr. Goetz met alone. Mr. Bell came out of

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the meeting with Mr. Goetz and told Mr. Shenker that Mr. Goetz wanted to expand his licenses, that Mr. Goetz would pay 2% of all additional business to Mr. Shenker as consulting fees and that Mr. Shenker would split that fee with Mr. Bell. Mr. Shenker then met alone with Mr. Goetz in Mr. Bell's office at WWE. Mr. Goetz told Mr. Shenker he wanted to increase his business with Wal-Mart and would pay him 2% to get it. Mr. Goetz and Mr. Shenker discussed other potential non-WWE license opportunities for Trinity. Mr. Shenker subsequently visited Mr. Goetz in California and believes he made telephone calls on Trinity's behalf to the National Basketball Association, the World Wildlife Fund and the National Wildlife Conservatory. Despite assurances from Mr. Goetz that he would provide SSAI with a written consulting agreement, he never did so and Mr. Goetz never explained to SSAI how he would calculate what SSAI was owed. Mr. Goetz made a total of three payments to Mr. Shenker or SSAI. SSAI paid half the total amount it received from Trinity to Mr. Bell. SSAI assumes that Mr. Goetz's brother, Dean Goetz, as a partner at Trinity, reviewed and approved the relationship with SSAI and Trinity. SSAI also assumes that Barbara Goetz, as the accountant who authored the various checks to SSAI, as well as any others in Trinity's financial department who

calculated the payments to SSAI knew of the relationship between Trinity and SSAI.

In addition, in late 1998 or early 1999, Mr. Shenker brokered a deal with WWE's knowledge, whereby a failing WWE licensee, Playmates, sold its inventory and tooling and molds to another WWE licensee, Jakks. Mr. Shenker raised the problem at WWE executive meetings that, unless a buyer were found for Playmates' inventory, the product would be dumped on the market at discount, thereby devaluing the WWE brand. Mr. Bell gave Mr. Shenker permission to broker the deal provided he received half of the fee. Jakks paid Mr. Shenker a \$40,000 commission. Mr. Shenker paid Mr. Bell half of that amount.

7. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever received any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee?

RESPONSE: Except as disclosed above, no.

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8. If your answer to Interrogatory No. 7 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or

RESPONSE: N/A

REQUEST FOR PRODUCTION OF DOCUMENTS

Produce documents responsive to the following paragraph:

- 1. All documents that refer to or relate in any way to the solicitation, request or demand of any type of payment, including, but not limited to, any consulting fees,

service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee.

RESPONSE: As of this date, SSAI has produced all documents responsive to this request.

2. All documents that refer or relate in any way to the solicitation, request or demand of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee.

RESPONSE: Plaintiff is not aware of any such documents.

3. All documents that refer or relate in any way to the receipt of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee.

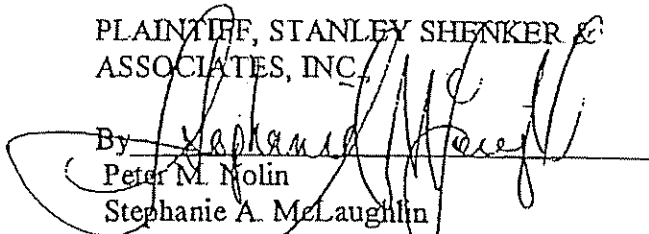
RESPONSE: As of this date, SSAI has produced all documents responsive to this request.

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4. All documents that refer or relate in any way to the receipt of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee.

RESPONSE: Plaintiff is not aware of any such documents.

PLAINTIFF, STANLEY SHENKER &
ASSOCIATES, INC.

By 
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PLAINTIFF'S VERIFICATION

I, STANLEY SHENKER, hereby verify that I have read the foregoing Interrogatories, and believe them to be true and correct to the best of my knowledge.

STANLEY SHENKER & ASSOC.

BY: Stanley Shenker
(print) STANLEY SHENKER

STATE OF Connecticut :

COUNTY OF Fairfield :

Subscribed and sworn to before me this 18th day of February

2003.

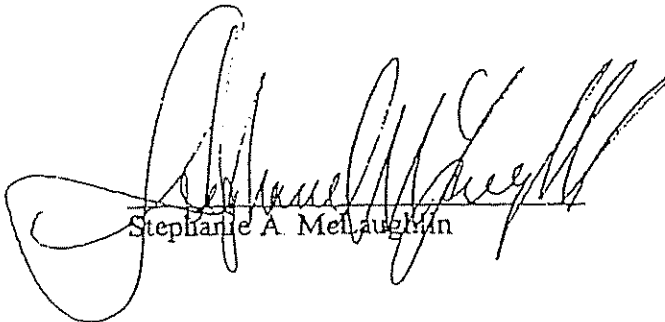
Stephanie M. [Signature]
~~Notary Public~~
Commissioner of the Superior Court

CERTIFICATION

This is to certify that a copy of the foregoing Amended Responses to Defendant's Third Set of Interrogatories and Second Request for Production of Documents has been faxed and mailed, postage prepaid, this 18th day of February, 2003, to:

Richard P. Colbert, Esq.
Day Berry & Howard
One Canterbury Green
Stamford, CT 06901
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